

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

AMERISURE INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.:
)	CV-06-1097-MHT
)	
LOWDER CONSTRUCTION)	
COMPANY, INC. and COLONIAL)	
REALTY LIMITED PARTNERSHIP,)	
d/b/a COLONIAL PROPERTIES REALTY)	
LIMITED PARTNERSHIP,)	
)	
Defendants.)	

MOTION FOR EXTENSION OF TIME TO RESPOND

COMES NOW the plaintiff, **Amerisure Insurance Company** (“Amerisure”), and asks for additional time to respond to defendant Lowder Construction Company, Inc.’s Motion to Strike Expert. As grounds, plaintiff pleads as follows:

1. Counsel for plaintiff will be out of the office and unable to respond to the motion during the week of September 10 – 14, 2007.
2. Plaintiff’s counsel has conferred with counsel for defendant, Lowder, and he has no objection to an extension of time to respond.
3. No parties will be prejudiced by an extension of time to respond.

WHEREFORE, PREMISES CONSIDERED, plaintiff asks this Honorable Court for an extension of time to respond to defendant Lowder Construction Company, Inc.’s Motion to Strike Expert.

Respectfully submitted,

s/ Kile T. Turner
Kile T. Turner
Bar Number: ASB-8182-U83K
Attorney for Plaintiff
Norman, Wood, Kendrick & Turner
Financial Center – Suite 1600
505 20th Street North
Birmingham, Alabama 35203
Phone: (205) 328-6643
Fax: (205) 251-5479
Direct Dial: (205) 259-1033
Email: kturner@nwkt.com

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of September, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: crh@jbpp.com, wjones@jbpp.com, tnovak@ball-ball.com, ccowen@ball-ball.com, and dwp@jbpp.com and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant:

s/ Kile T. Turner
Norman, Wood, Kendrick & Turner
Financial Center – Suite 1600
505 20th Street North
Birmingham, AL 35203
Phone: (205) 328-6643
Fax: (205) 251-5479
Direct Dial: (205) 259-1033
Email: kturner@nwkt.com